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OAKLAND UNIFIED SCHOOL DISTRICT,  
KIMBERLY STATHAM and GOVERNING BOARD OF  
THE OAKLAND UNIFIED SCHOOL DISTRICT

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

FARM MENG SAEPHAN,

Plaintiff,

vs.

OAKLAND UNIFIED SCHOOL DISTRICT;  
KIMBERLY STATHAM, State Administrator of the  
Oakland Unified School District; GOVERNING  
BOARD OF THE OAKLAND UNIFIED SCHOOL  
DISTRICT,

Defendants.

Case No. C 06 4428 JCS

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
VACATING ALL DEADLINES**

Plaintiff FARM MENG SAEPHAN and Defendants OAKLAND UNIFIED SCHOOL DISTRICT; KIMBERLY STATHAM, State Administrator of the Oakland Unified School District; GOVERNING BOARD OF THE OAKLAND UNIFIED SCHOOL DISTRICT, (collectively "Defendants"), by and through their respective attorneys of record, agree as follows:

WHEREAS, the Court's July 31, 2007 Further Case Management and Pretrial Order and the Court's November 27, 2007 Order Continuing Deadline for Motion to Compel re Fact Discovery set forth the original, as well as the continued, deadlines and cutoff dates in this action;

WHEREAS, the parties remain engaged in settlement discussions and are optimistic of reaching an agreement which would lead to the potential resolution of this matter in its entirety;

1 WHEREAS, the parties wish to avoid burdening themselves and the Court with potentially  
2 avoidable proceedings regarding this matter;

3 WHEREAS, the parties anticipate that any settlement agreement should be finalized by  
4 January 11, 2008;

5 IT IS THEREFORE STIPULATED that all pending deadlines applicable to this matter are  
6 hereby provisionally vacated for purposes of facilitating a settlement of this matter; provided,  
7 however, that the parties agree to jointly move the Court for reinstatement of those deadlines, to  
8 occur on such continued dates as may be approved by the Court, should such a settlement not be  
9 reached.

10 Accordingly, the parties respectfully request that the Court (1) vacate all pending deadlines  
11 in this matter, without prejudice to recalendaring such deadlines to occur on such future dates as  
12 the Court may order should settlement not occur, and (2) schedule a further case management

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conference on or after Friday, January 11, 2008.

**IT IS SO STIPULATED.**

Dated: December 3, 2007

DEBORAH A. COOKSEY  
Interim General Counsel

By: /s/  
Michael L. Smith  
Attorneys for Defendants

Dated: December 3, 2007

THE LEGAL AID SOCIETY  
Christopher Ho

By: /s/  
Christopher Ho  
Attorneys for Plaintiff

GOOD CAUSE APPEARING, (1) all pending deadlines in this matter are vacated and (2) a further case management conference is scheduled for January 11, 2008 at 1:30 p.m. in Courtroom A.

**IT IS SO ORDERED.**

Dated: Dec. 4, 2007

